

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES DBP/USPS-63 THROUGH 65**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated September 2, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.
Chief Counsel, Global Business

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
September 19, 2011

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-63 Please refer to your response to Interrogatory PR/USPS-12 subpart [f].

- [a] Please advise when the Postal Service plans to file the first update to The List.
- [b] At what intervals does the Postal Service plan to file subsequent updates?
- [c] Please confirm, or explain if you are unable to confirm, that the updates to The List will consist of corrections and/or deletions and will not consist of additions.

RESPONSE

- (a) The week of September 19, 2011.
- (b) Monthly.
- (c) There is not intent to add facilities that should not be on the list.

Corrections and additions are not mutually exclusive.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-64 Please refer to Library Reference N-2011-1/9.

- [a] Please provide a new listing showing the two-letter state abbreviation added as an additional column. This is needed to make the Public version useful since the Finance Numbers have been redacted.
- [b] What is the significance of the single digit that follows the Unit Name in many of the entries?
- [c] On what basis are the individual offices sorted in the printout?

RESPONSE

- (a) See USPS Library Reference N2011-1/19.
- (b) None.
- (c) By total walk-in revenue from highest to lowest.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-65 Please refer to Library Reference N-2011-1/8.

- [a] On what basis are the individual offices sorted in the printout?
- [b] Please confirm or explain that the Public Version of this reference has redacted only the Facility Finance Number and the PO Boxes Rented Total.
- [c] Please confirm or explain that the column of numbers represents the total number of boxes installed at the listed facility, both rented and non-rented.
- [d] Please advise what categories of facilities are contained in this Library Reference and what categories are not contained.
- [e] How are Post Office Box numbers that are utilized for Caller Service and Firm Holdout delivery accounted for in the data shown in this Library Reference?

RESPONSE

- (a) Area, District, then Office name.
- (b) Confirmed.
- (c) Confirmed.
- (d) The list contains Post Offices, Station/Branches, and CPUs that rent P.O. Boxes. Facilities not listed are facilities without P.O. Boxes.
- (e) P.O. Box numbers are accounted for, irrespective of whether Caller Service is associated with a particular box. Firm Holdout is associated with street addresses, not P.O. Boxes.